

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Preparation for International
Telecommunication Union World
Radiocommunication Conferences

IC Docket No. 94-31

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OPPOSITION

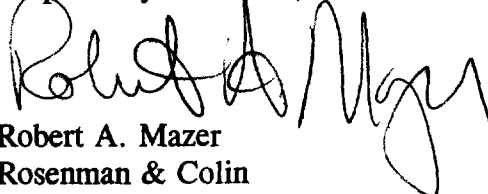
Leo One USA Corporation ("Leo One USA"), by counsel, hereby responds to the Petition for Clarification of Pronet, Inc. ("Petition") filed in the above-captioned proceeding. The Commission in its Report in this proceeding defined a U.S. position for the 1995 World Radiocommunications Conference ("WRC-95") that seeks an allocation of 216-216.5 MHz 217.5-218 MHz bands for the Mobile Satellite Service (MSS). In a separate domestic proceeding the Commission has proposed to allocate the 216-216.5 MHz band on a secondary non-interference basis to the Low Power Radio Services ("LPRS") and Law Enforcement Tracking Systems ("LETS"). In its Petition, Pronet asks the Commission for clarification that the LPRS and LETS would be co-primary with MSS.

Leo One USA is a pending applicant for a non-voice non-geostationary mobile satellite service system ("NVNG MSS") and therefore has a vital interest in the outcome of WRC-95. Leo One USA along with the other NVNG MSS proponents proposed the allocation of the 216-216.5 MHz band for MSS in the Joint Supplemental filing submitted to the Commission in this proceeding on May 18, 1995. With regard to the Pronet clarification request, Leo One USA believes that it is premature and unnecessary. As Pronet acknowledges, the FCC has merely defined a U.S. proposal for WRC-95 and has not

initiated any domestic proceeding proposing to allocate the 216-216.5 MHz band to MSS. Leo One USA agrees with the Commission that the issue of sharing criteria between MSS and LETS/LPRS should properly be resolved in a domestic allocation proceeding subsequent to WRC-95. At that time, the FCC will have information on the scope of the international allocation and be in position to review domestic sharing issues. Therefore, any decision on the issue of domestic sharing is premature at this time. Moreover, if these are technical questions raised in a U.S. domestic proceeding regarding the use of the 216-216.5 MHz band it would undercut the U.S. position at-2 WRC-95.

Regardless of the procedural questions discussed above, Leo One USA does believe that MSS can successfully share the 216-216.5 MHz band with LETS/LPRS through the use of an appropriate Power Flux Density ("PFD") limit and is prepared after WRC-95 to engage in technical discussions to develop this limit. In the meantime, the U.S. should maintain its proposal to allocate the 216.0-216.5 MHz band as it currently exists.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert A. Mazer", is written over the typed name and address.

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August 10, 1995

Attorney for Leo One USA Corporation

CERTIFICATE OF SERVICE

I, Robert A. Mazer, do hereby certify that a true and correct copy of the foregoing "Opposition" by Leo One USA Corporation was sent by first-class mail, postage prepaid, or hand-delivered*, on this 10th day of August, 1995, to the following persons.

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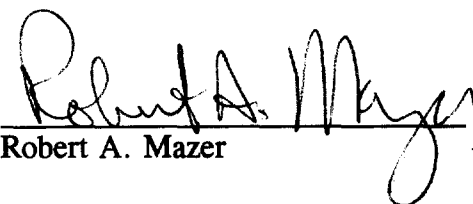
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